IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

MARTIN J. WALSH,)	
SECRETARY OF LABOR,)	
U.S. DEPARTMENT OF LABOR,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 4:22-CV-3246
)	
PACKERS SANITATION SERVICES,)	
INC., LTD.,)	
)	
)	
Defendant.)	

DECLARATION OF PAUL DECAMP

- I, Paul DeCamp, hereby declare that the statements made in this Declaration, pursuant to 28 U.S.C. § 1746, are true and correct to the best of my knowledge and belief. I understand that false statements made herein are subject to the penalties of perjury and state as follows:
- 1. I am over 18 years of age, I am a resident of the Commonwealth of Virginia, and I am competent to testify to the matters stated in this declaration. If called and sworn as a witness, I could and would testify competently and truthfully to the matters stated in it.
- 2. I am a member of the Employment, Labor, and Workforce Management Practice Group at the law firm Epstein, Becker & Green, P.C., based in the firm's Washington, D.C. office. I am the national co-chair of the firm's wage and hour practice, and I devote substantially all of my practice to federal, state, and local wage and hour litigation, administrative investigations, and counseling. For approximately the past 15 years, I have practiced almost exclusively in the area of wage and hour law, with a heavy emphasis on Fair Labor Standards Act ("FLSA") issues, including child labor matters. Before joining Epstein, Becker & Green, I was a partner for nine-

plus years in a national employment law boutique law firm, where I chaired the firm's wage and hour practice.

- 3. From August of 2006 through December of 2007, I served as the Administrator of the U.S. Department of Labor's Wage and Hour Division, the chief federal officer appointed by the President with responsibility for interpreting and enforcing the Nation's wage and hour laws, including the FLSA's child labor provisions. During my time at the Wage and Hour Division, I was involved in more than 100 child labor investigations, including several where I was personally on-site during the field investigative work.
- 4. I have testified before various congressional committees, at the invitation of Congress, six times on a variety of wage and hour topics, including in 2019, 2021, and 2022. I frequently speak at conferences and publish materials on wage and hour law, and various media outlets quote me on wage and hour topics several dozen times each year. Over the past six months, I have presented on wage and hour issues before the American Bar Association, the Virginia Bar Association, the American Employment Law Council, the American Law Institute Continuing Legal Education program, and the Retail Law Conference.
- 5. In the course of my work at the Wage and Hour Division, and in the years since, I have become very familiar with how the agency conducts child labor investigations, as well as how it records and reports its enforcement findings. The Department of Labor's current mechanism for providing enforcement information to the public is through the Department's enforcement database, accessible from the Wage and Hour Division's website, www.dol.gov/agencies/whd, then selecting the "Resources" drop-down menu, followed by the

"DOL Enforcement Database" option¹, which then brings the user to the searchable database. Alternatively, members of the public can go straight to the database by entering https://enforcedata.dol.gov/homePage.php?ga=2.7869371.807472305.1669815806-809266887,1651784739 in their web browser.²

- 6. Once a user arrives at the main enforcement database web page, a "Search" tab appears toward the top of the page. Clicking on the "Search" option brings up a search page that, in turn, allows various options for conducting a search.³ Clicking on the "Search Form" option at the right of the page brings the user to a page that allows entry of various parameters to search the enforcement database.⁴
- 7. At this search page, clicking the box for "WHD Cases" under the "Select" heading, leaving the "Select State" option blank, and clicking the box for "Company Name" under the "Search By" heading causes a box to appear at the right of the page that allows entry of a "Company Name". Entering "Packers Sanitation" in this box brings up four different potential employer matches in the database: "PACKERS SANITATION SERVICES"; "PACKERS SANITATION SERVICES, inc."; and "PACKERS SANITATION SERVICES, INC."; and "PACKERS SANITATION SERVICES, INC."; LTD."⁵

¹ Exhibit A hereto shows the Wage and Hour Division home web page after clicking on the "Resources" drop-down menu.

Exhibit B hereto shows the main web page for the Department's enforcement database.

Exhibit C hereto shows the web page that offers the various search options.

Exhibit D hereto shows the web page that allows entry of search terms.

⁵ Exhibit E hereto shows the web page with the pertinent search terms selected, along with the four options available upon typing "Packers Sanitation Services" into the "Company Name" box.

- 8. Selecting the first of these four employer options, PACKERS SANITATION SERVICES, and clicking "Search" leads to a page indicating two records found, with the option of exporting the results as an Excel spreadsheet.⁶ Clicking the Excel spreadsheet icon causes an Excel spreadsheet to download to the user's computer. This spreadsheet displays the results of two Wage and Hour Division investigations, one in White Hall, Arkansas covering the period from May 30, 2011 through May 29, 2013, and the other in Tolleson, Arizona covering the period from December 9, 2019 through January 5, 2020. The investigation in Arkansas resulted in a finding that the company owed three workers a total of \$134.70 in FLSA back wages, and the Arizona investigation resulted in a finding that the company owed one worker \$526.50 in FLSA back wages. Neither investigation resulted in the imposition of civil money penalties, nor was there any finding of child labor violations or, indeed, of violations of any of the other statutes the Department enforces.⁷
- 9. Returning to the search page and selecting the second of the four employer options, PACKERS SANITATION SERVICES (PSSI), leads to a comparable page showing two records found, along with the option of exporting the results in an Excel file. That spreadsheet displays

⁶ Exhibit F hereto shows the page that results after searching under PACKERS SANITATION SERVICES.

Exhibit G hereto shows the enforcement spreadsheet for PACKERS SANITATION SERVICES. The Arkansas case appears in line 2 under Case ID (which is in column A) 1689491. The Arizona case appears in line 3 under Case ID 1907730. Column K shows the absence of civil money penalties imposed, and columns L and M show the number of employees affected by violations and the amount of back wages owed. The term "ATP" in the column headings is agency-speak for "agreed to pay" or "agreement to pay", indicating that company committed to the Wage and Hour Division that it would pay the amount specified. "BW" refers to back wages. "EE" refers to employees. Columns AN, AO, and AP show the absence of child labor violations, employees affected by child labor violations, or penalties assessed in connection with such violations. The term "CL" in the column headings refers to child labor, and "CMP" refers to civil money penalties, also known as civil monetary penalties.

the results of two investigations. The first, Case ID 1965790, is from Perry, Iowa and covers the period from May 9, 2020 through May 8, 2022. The second case, Case ID 1965791, is from Mount Pleasant, Iowa and covers the same time period as the Perry matter. In each case, the Wage and Hour Division identified no violations of any sort, including no child labor violations, found no back wages due, and assessed no civil money penalties.⁸

- 10. Returning to the search page and selecting the third of the four employer options, PACKERS SANITATION SERVICES, INC., leads to a comparable page showing one record found, along with the option of exporting the results in an Excel file. That spreadsheet displays the results of that investigation. That matter, Case ID 1706411, is from Tolleson, Arizona and covers the period from January 1, 2012 to January 1, 2014. This matter resulted in no findings of violations of any sort, including no child labor violations, no back wages due, and no civil money penalties.⁹
- 11. Returning to the search page and selecting the fourth of the four employer options, PACKERS SANITATION SERVICES, INC., LTD., leads to a comparable page showing one record found, along with the option of exporting the results in an Excel file. That spreadsheet displays the results of that investigation. That matter, Case ID 1870620, is from Moosic, Pennsylvania and covers the period from October 12, 2018 through January 17, 2019. The

⁸ Exhibit H hereto shows the enforcement spreadsheet for PACKERS SANITATION SERVICES (PSSI). The pertinent information showing no violations and the related findings appears in columns J, K, L, M, Q, X, AM, AN, AO, and AP.

⁹ Exhibit I hereto shows the enforcement spreadsheet for PACKERS SANITATION SERVICES, INC. The pertinent information showing no violations and the related findings appears in columns J, K, L, M, Q, X, AN, AO, and AP.

investigation identified one FLSA overtime violation affecting a single employee, resulting in a back wage finding of \$663.00. There were no child labor violations and no civil money penalties.¹⁰

- 12. Returning to the search page and entering "PSSI" in the Company Name box brings up the option of "PSSI (PACKERS SANITATION SERVICES, INC.)." Searching that employer leads to a comparable page showing one record found, along with the option of exporting the results in an Excel file. That spreadsheet displays the results of that investigation. That matter, Case ID 1587103, is from Glen Allen, Virginia and covers the period from April 30, 2010 through October 8, 2010. The investigation disclosed a total of 55 FLSA minimum wage and overtime violations affecting 48 employees, resulting in \$5,249.19 in back wages owed, with no civil money penalties and no child labor violations. ¹¹
- 13. Returning to the search page and entering "PSSI" in the Company Name box and then running a search on that name leads to a comparable page showing five records found, along with the option of exporting the results in an Excel file. That spreadsheet displays the results of the five investigations. The first, Case ID 1616048, is from Dumas, Texas and covers the period from April 3, 2011 through April 17, 2011. The investigation identified one employee owed \$587.25 in FLSA minimum wage, with no other violations and no penalties assessed. The second case, Case ID 1767825, is from Liberal, Kansas and covers the period from August 19, 2013 through August 16, 2015. That investigation identified one unspecified FLSA violation, affecting a single employee, with no back wages due and no penalties assessed. The third case, Case ID

¹⁰ Exhibit J hereto shows the enforcement spreadsheet for PACKERS SANITATION SERVICES, INC., LTD. The pertinent findings appear in columns J, K, L, M, Q, S, T, V, X, AN, AO, and AP.

Exhibit K hereto shows the enforcement spreadsheet for PSSI (PACKERS SANITATION SERVICES, INC.). The pertinent findings appear in columns J, K, L, M, N, Q, S, T, U, V, AN, AO, and AP.

1801867, is from Kieler, Wisconsin and covers the period from September 9, 2016 through December 9, 2016. That investigation focused on Family and Medical Leave Act ("FMLA") issues affecting a single employee and identified no FLSA violations, with no FLSA back wages due and no penalties assessed. The fourth case, Case ID 1845133, is from Tyler, Texas and covers the period from July 29, 2017 through February 9, 2018. As with the matter from Kieler, Wisconsin, this investigation focused on FMLA issues affecting a single employee and identified no FLSA violations, with no FLSA back wages due and no penalties assessed. The fifth case, Case ID 1967970, is from Bolingbrook, Illinois and covers the period from June 17, 2020 through June 16, 2022. That investigation identified no violations of any kind, with no back wages due and no penalties assessed. In none of the five cases discussed in this paragraph did the Wage and Hour Division find even a single FLSA child labor violation.¹²

14. These six employers identified in these database searches refer to the same business. The presence of slightly different business names in the database reflects the reality that different investigators may enter an employer's name into the Department's computers slightly differently. After searching for other variations on the company's name, I believe that these six employers very likely represent the universe of Wage and Hour Division investigations involving this business reported in the agency's database. It is possible that investigators entered additional matters using a misspelling of the business name, which would render locating those matters via searches difficult, if not impossible. I am not aware of any additional Wage and Hour Division investigations involving this business beyond those addressed in this Declaration, and not counting the present litigation, which does not yet appear in the enforcement data.

Exhibit L hereto shows the enforcement spreadsheet for PSSI. The pertinent findings appear in columns J, K, L, M, N, Q, S, T, U, X, AJ, AK, AL, AM, AN, AO, and AP.

- 15. Together, the Wage and Hour Division's enforcement data show a total of just twelve investigations involving this employer during the time period from April 30, 2010 to the present, ten of which appear to have focused on the FLSA and two of which appear to have focused on the FMLA. Four of those investigations, including three from 2022, found no violations of any sort. Of the remaining eight investigations, two apparently did not involve the FLSA, while the other six disclosed FLSA violations affecting a total of 56 employees, involving a combined \$7,160.64 in back wages. Not one of these investigations identified even a single child labor violation of any sort, nor has the agency assessed civil money penalties in any of these matters.
- 16. It is my understanding that Packers Sanitation Services employs in excess of 15,000 individuals at more than 400 locations in numerous states across the country. In my experience, it is very unusual for an employer of that size to have so few interactions with the Wage and Hour Division, and especially to have so few investigations resulting in findings of violations. For an employer of that size and geographic scope to have just five investigations over a twelve-year period resulting in FLSA back wages owed, with payments due to only 56 workers, totaling under \$7,200, and with no civil money penalties is extraordinary and indicates a very high degree of compliance with the FLSA.
- 17. By way of comparison, in 2016, the Wage and Hour Division, whose roughly 1,700-employee workforce is less than 1/8 the size of the workforce at Packers Sanitation Services, agreed to pay \$7 million to its own employees to remedy the agency's own FLSA violations. *See* Tom Starner, *Labor Dept. Settles Its Own \$7M, Decade-Long, Wage And Hour Lawsuit*, HR Dive (Aug. 24, 2016), available at https://www.hrdive.com/news/labor-dept-settles-its-own-7m-decade-long-wage-and-hour-lawsuit/424995/.

- 18. In addition, the Wage and Hour Division misclassified every single one of its Wage and Hour Investigators as overtime-exempt from the 1930s into the 1970s, until the Office of Personnel Management pointed out to the agency that the administrative exemption did not apply because the investigators engage in the production work of the agency. *See Improving the Federal Wage and Hour Regulatory Structure: Hearing Before the Subcomm. On Workforce Protections of the H. Comm. on Education and the Workforce*, 113th Cong. (2014) (statement of Paul DeCamp), available at https://edlabor.house.gov/imo/media/doc/DeCamp%20Testimony.pdf.¹³
- 19. It is also my understanding that Packers Sanitation Services has a policy of not employing workers under the age of 18 and that it uses E-Verify to confirm the lawfulness of every individual it hires. In my experience, employers that desire to cheat their workers, or to skirt the law, or even just to push the envelope by taking their practices as close to the legal line as they can without crossing the line, do not do either of these things. Having a categorical rule of not hiring individuals under age 18 is the best, strongest prophylactic policy to avoid child labor violations, and such a policy is far more conservative than, and goes well beyond, the Wage and Hour Division's own published "Seven Child Labor Best Practices for Employers" *See* https://www.dol.gov/agencies/whd/child-labor/seven-child-labor-best-practices-for-employers.

And employers that have seemingly compliant policies on paper but that intend to skirt the law in

The purpose of pointing out the Wage and Hour Division's own history of FLSA noncompliance is not in any way to suggest that the agency is a bad actor employer. To the contrary, the Wage and Hour Division cares more about FLSA compliance than perhaps any other entity in the country. Yet even with its more than 80 years of enforcing the FLSA, along with its strong commitment to compliance, and its ability to issue FLSA interpretive guidance (though, strictly speaking, the FLSA interpretations applicable to the Wage and Hour Division's own employees come from a different federal agency), the Wage and Hour Division has repeatedly committed significant, though plainly unintentional, FLSA violations. When it comes to the FLSA, virtually nobody, even including the agency tasked with enforcing the law, is perfect. This context serves to demonstrate why Packers Sanitation Services' track record is one of substantial compliance with the FLSA.

practice do not generally use measures such as E-Verify. Nor do they experience ten FLSA

investigations by the Wage and Hour Division over the span of roughly a dozen years without even

a single child labor violation.

In sum, by all objective measures Packers Sanitation Services seems to be 20.

substantially in compliance with the FLSA, including its child labor provisions. The fact that the

Wage and Hour Division uncovered no child labor violations in any of the previous investigations

shows that there is in no sense a broad practice at the company of hiring minors or allowing them

to perform prohibited work. In my experience, it is virtually unheard-of for an employer with

15,000-plus workers at 400-plus facilities to have multiple no-violation investigations by the Wage

and Hour Division without having devoted substantial time and effort to ensuring compliance with

the FLSA. That type of favorable enforcement record does not happen by accident.

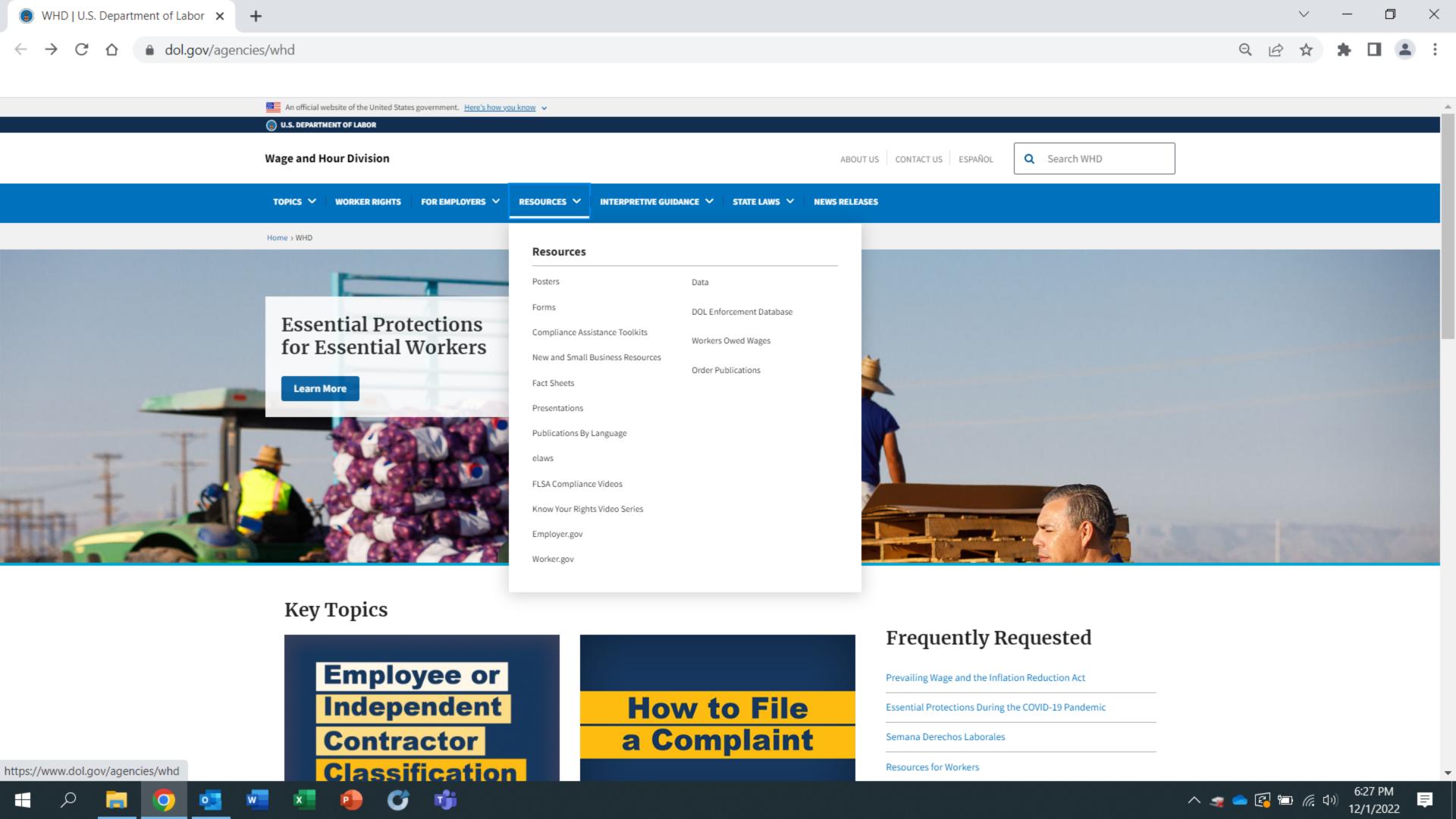
Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury under the laws of the United

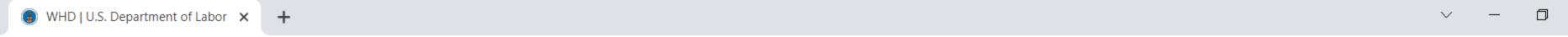
States of America that the foregoing is true and correct.

Executed on: December 1, 2022

Paul De Camp

EXHIBIT A





Classification

Proposed Rule: Employee or Independent Contractor Classification under the Fair Labor Standards Act



Protections for Workers in Construction under the Bipartisan Infrastructure Law

Recursos en Español

Recursos en Español

How to File a Complaint with the Wage and **Hour Division**



Workers Owed Wages

If you think you may be owed back wages collected by WHD, you can search our database of workers for whom we have money waiting to be claimed.



Family and Medical Leave Act

The FMLA entitles eligible employees of covered employers to take unpaid, job-protected leave for specified family and medical reasons with continuation of group health insurance

Resources for Workers

Wage and Hour Division Newsletter

State Minimum Wage Laws

Workers Owed Wages (WOW)

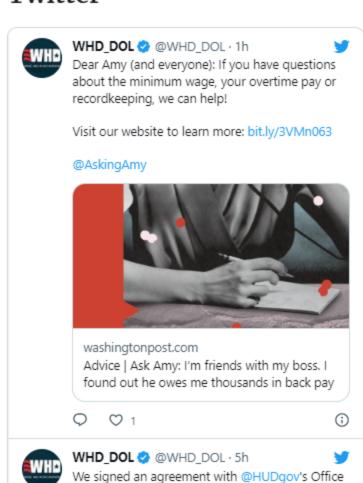
FMLA Employee Guide

Compliance Assistance Toolkits

Digital Reference Guide to the Fair Labor Standards Act

External User Portal (EUP)

Twitter





We signed an agreement with @HUDgov's Office of Field Policy & Management starting a collaborative relationship to:











■ dol.gov/agencies/whd













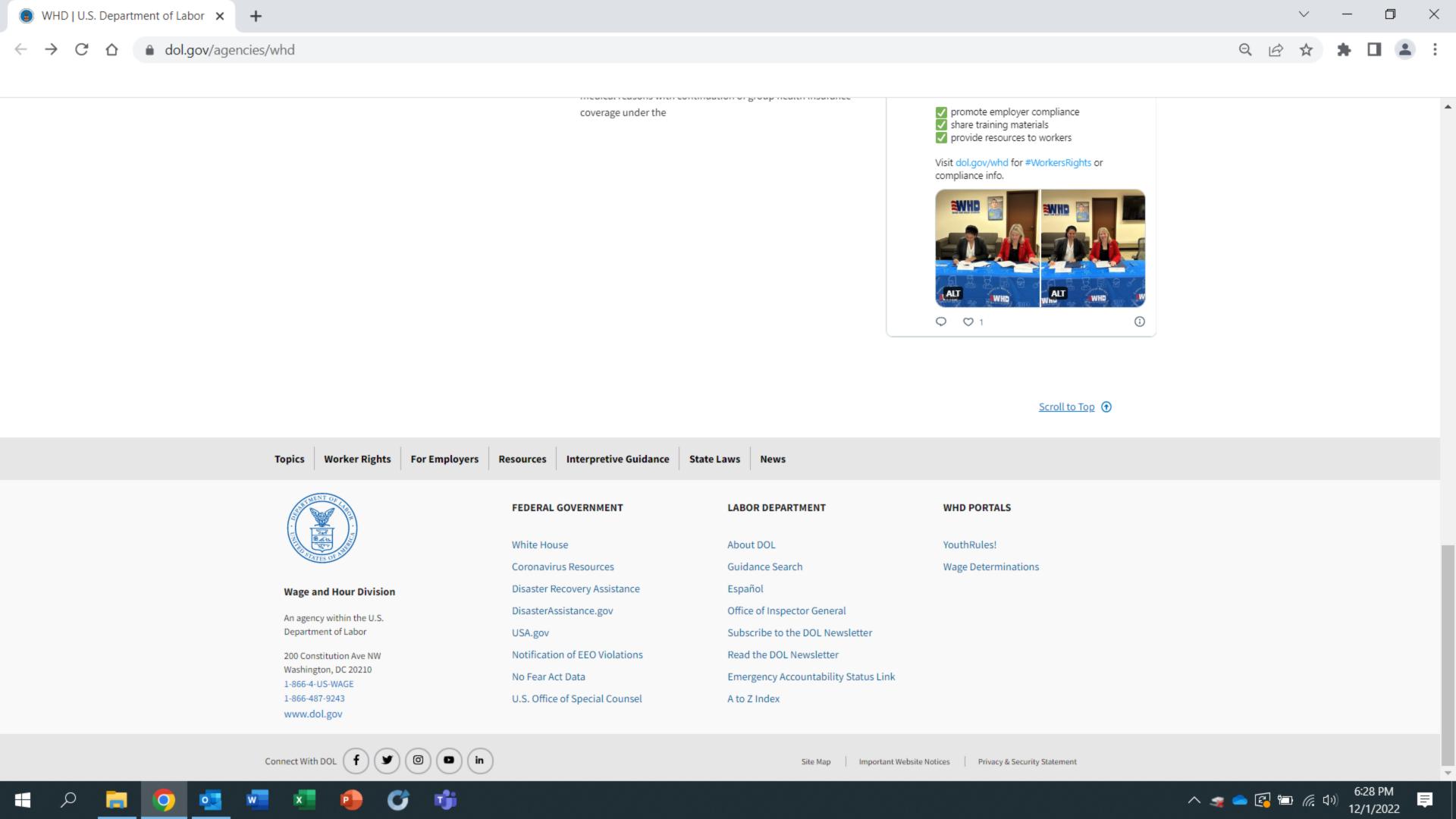
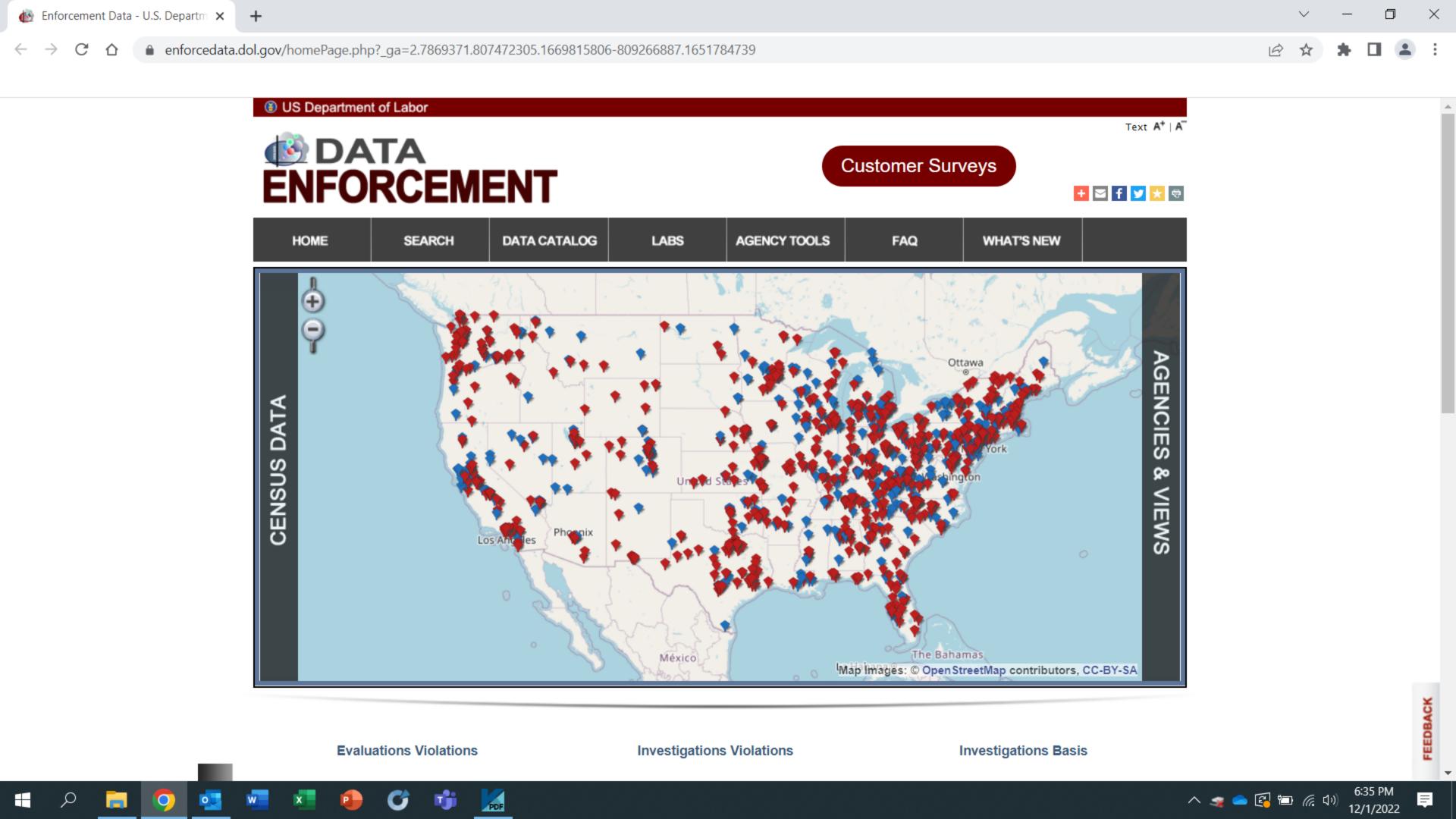


EXHIBIT B



American public, to engage with us, and react to our work by telling us what you think, and what you would like to see here!

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- DOL National and Regional News Releases
- Official Blog of the U.S. Department of Labor
- YouTube Videos from the U.S.



As a part of the Open Government Directive, each agency is publishing a plan that describes how it will improve transparency and







































Coverage: National **OFCCP** 1 2 3 4 5 Period: Fiscal Year 2022

Text Version

Welcome to DOL's enforcement data 4.0.2!

33%

The Department of Labor enforcement agencies foster and promote the welfare of wage earners and retirees of the United States, by ensuring their safety, improving their working conditions, and protecting their retirement and health care benefits.

In carrying out this mission, the Agencies administer and enforce a variety of Federal labor laws that guarantee workers' rights to safe and healthful working conditions, a minimum hourly wage and overtime pay, and freedom from employment discrimination, as well as the integrity of their pensions and health plans. This site aims to make the enforcement data, collected by these agencies in the exercise of their mission, accessible and searchable. It intends, also, to engage you the public in new and creative ways of using this data. It is a work in progress, but it is foremost our invitation to you, the American public, to engage with us, and react to our work by telling us what you think, and what you would like to see here!

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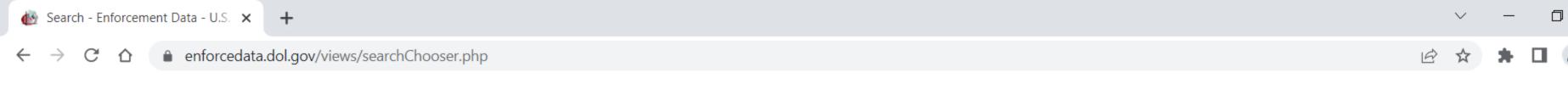


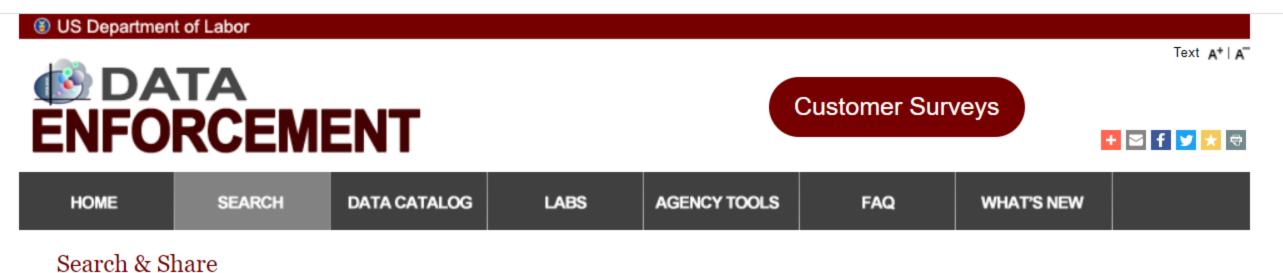




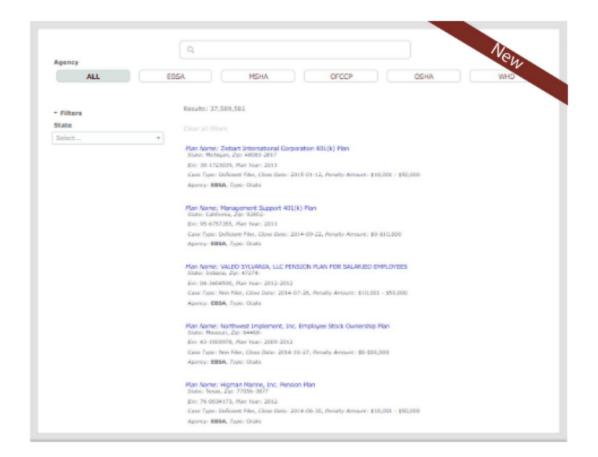
FEEDBACK

EXHIBIT C

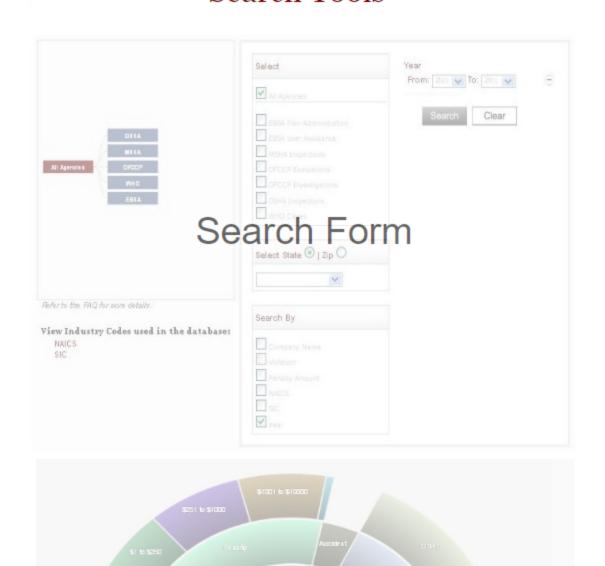




A Preview of the New Search



Search Tools



https://enforcedata.dol.gov/index.php?page=searchChooser





























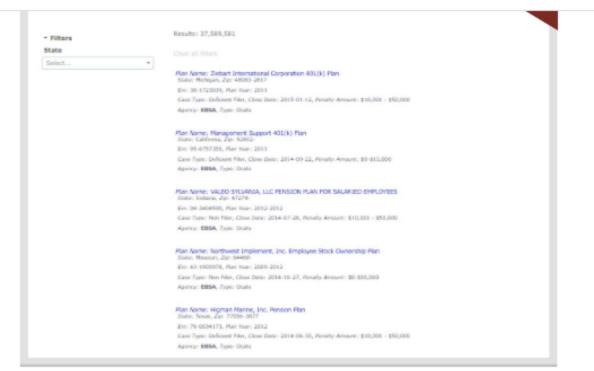


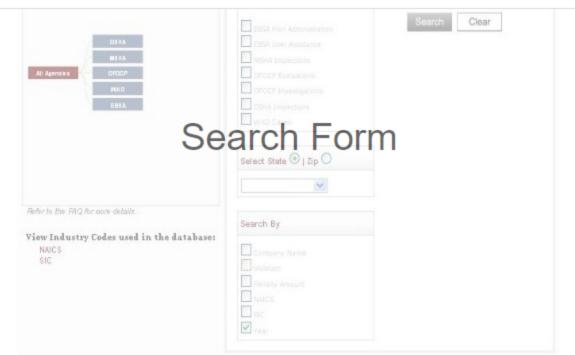


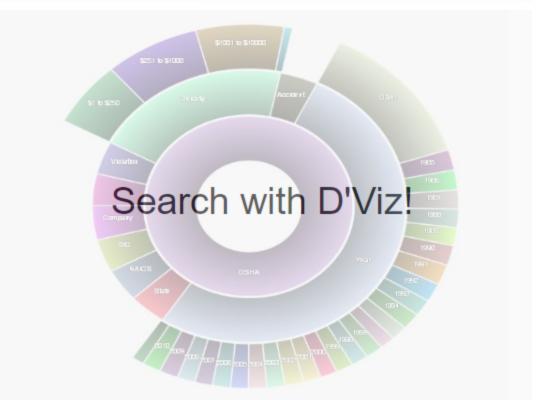












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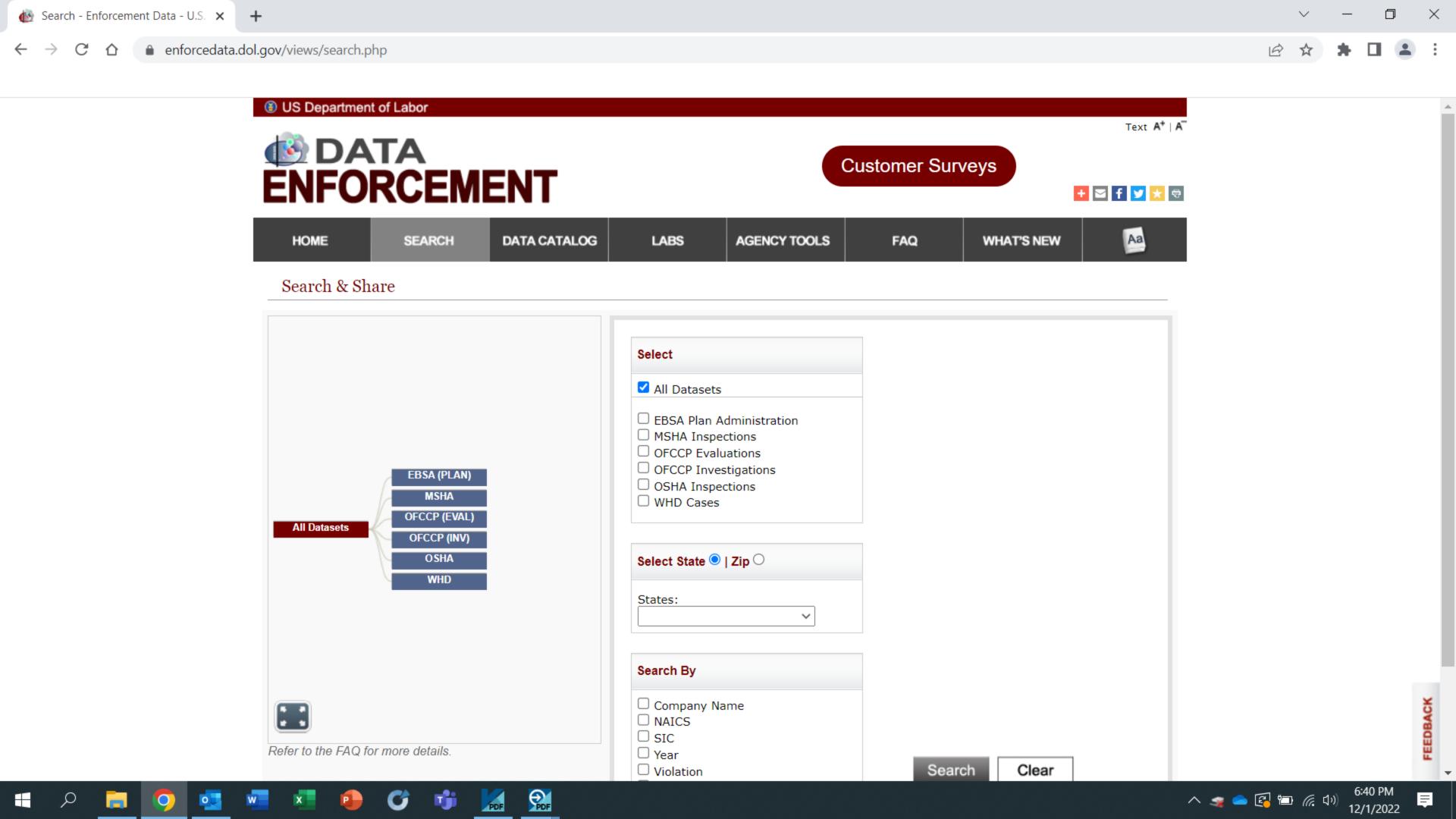








EXHIBIT D



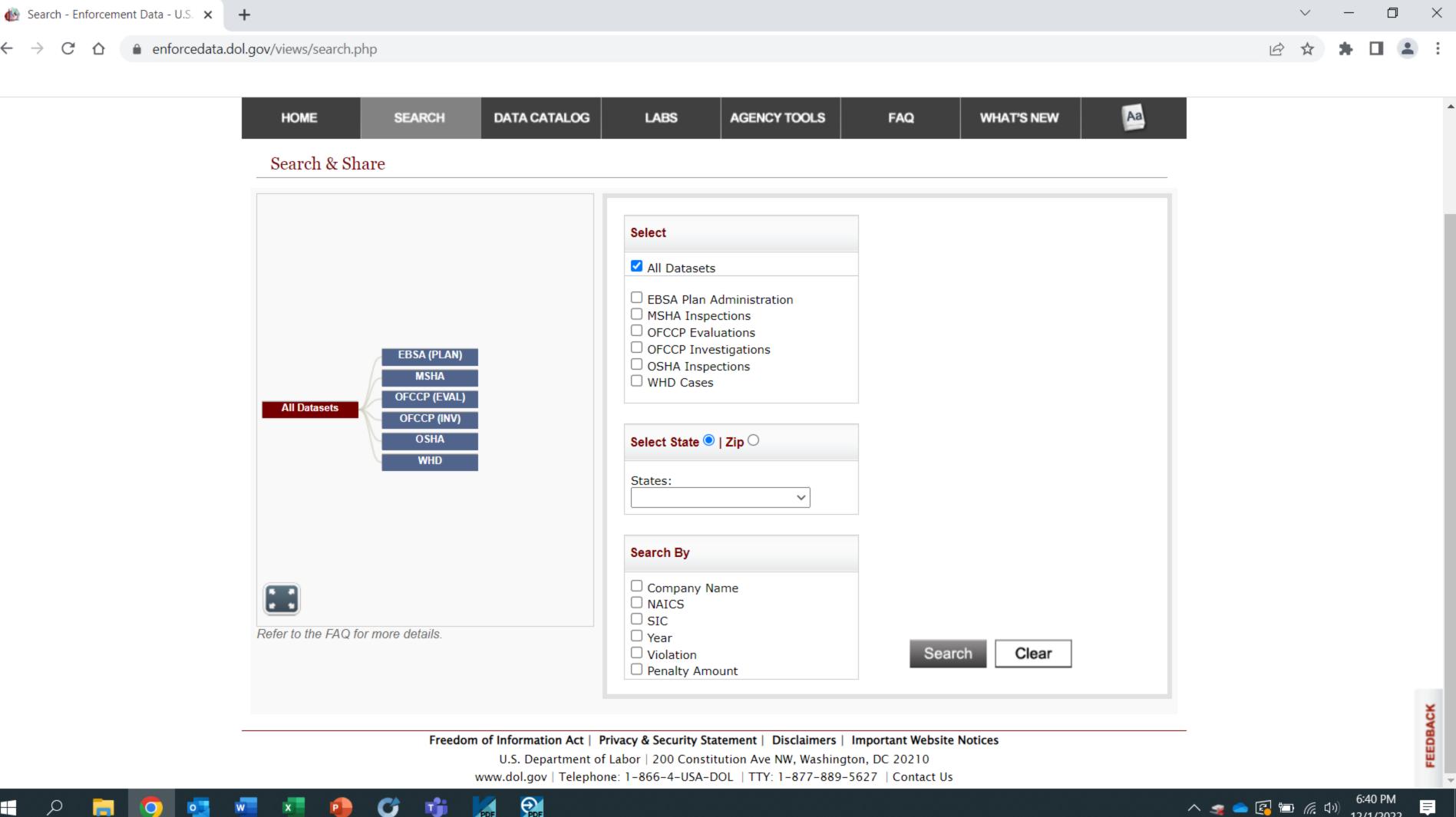
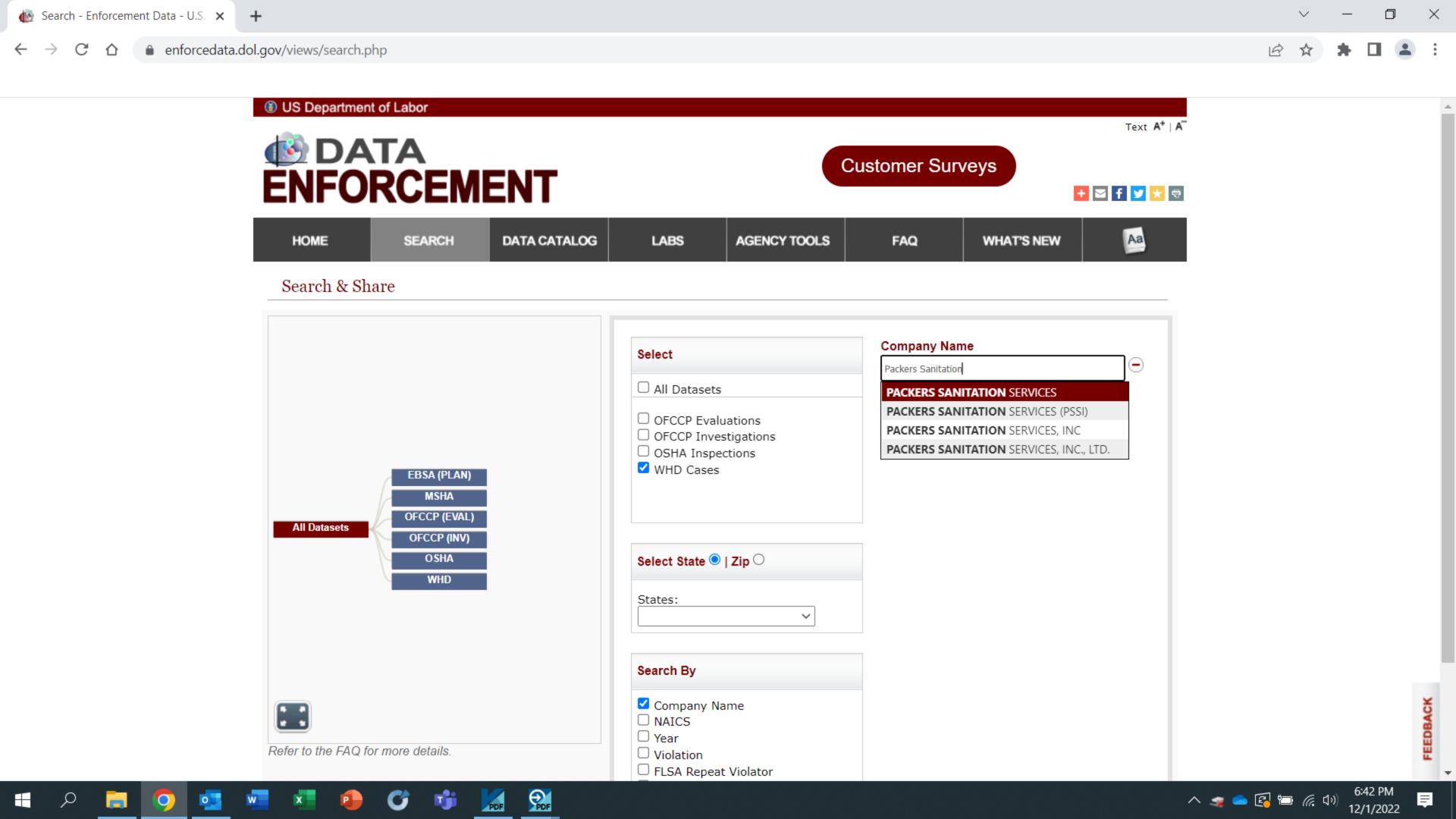
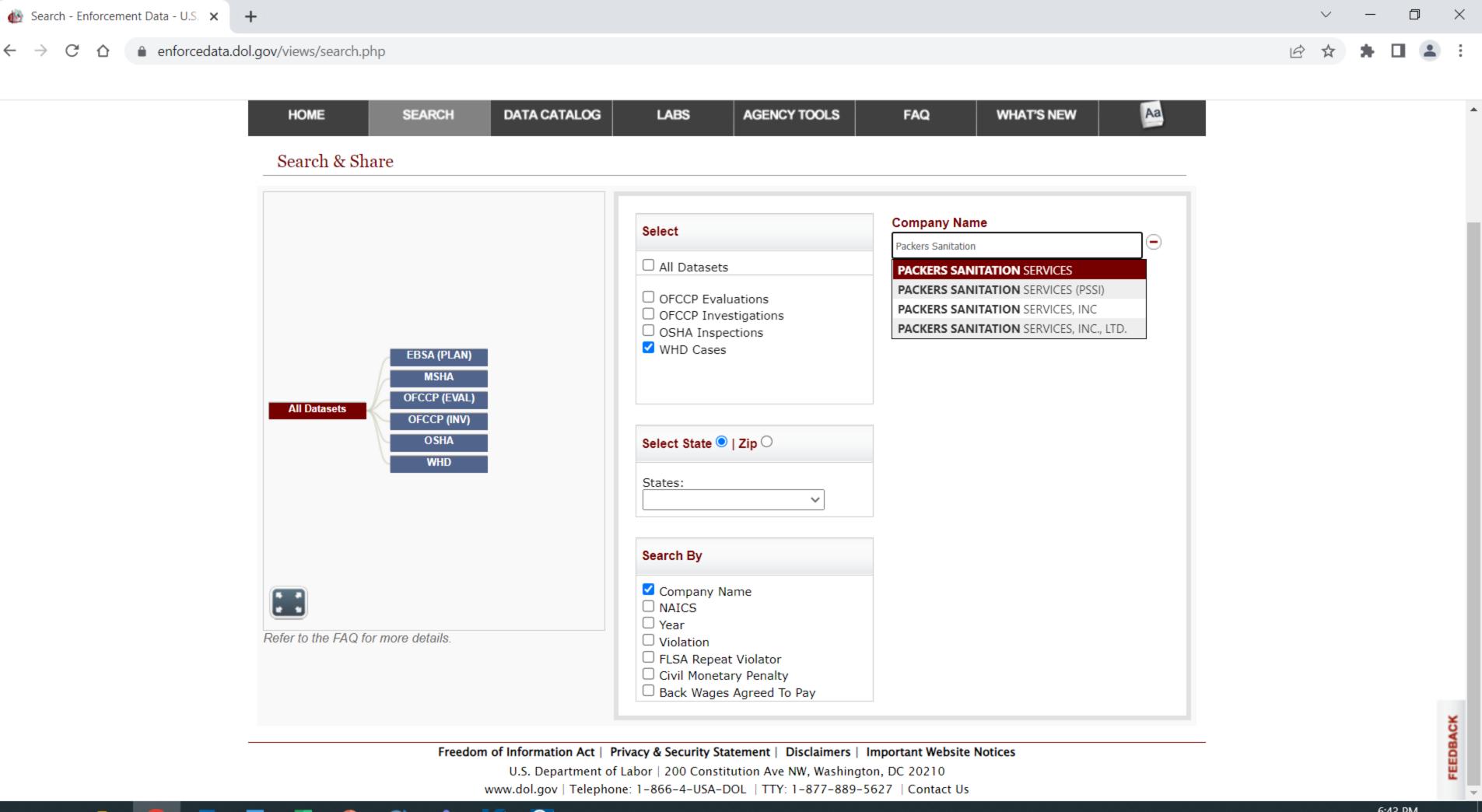


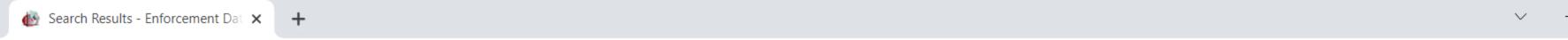
EXHIBIT E





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EXHIBIT F







Customer Surveys



	HOME	SEARCH	DATA CATALOG	LABS	AGENCY TOOLS	FAQ	WHAT'S NEW	Aa
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SEARCH RESULTS

Home ▶ Search ▶ Search Results

Search Criteria

enforcedata.dol.gov/views/searchResults.php

Agency:

Company Name: PACKERS SANITATION SERVICES

Agency	Records Found	Export Results			
WHD	2	X			
Click on an Agency name to see the search results					

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EXHIBIT G

	A	В	С	D
1	Case ID	Trade Name	Legal Name	Address
2	1689491	Packers Sanitation Services	Packers Sanitation Services, Inc.	5505 Jefferson Parkway
3	1907730	Packers Sanitation Services	Packers Sanitation Services Inc. LTD.	651 S. 91 Ave.

	Е	F	G	Н
1	City	State	Zip Code	NAICS
2	White Hall	AR	71602	561720
3	Tolleson	AZ	85353	561720

	I	J	K	L
1	NAICS Description	Total Case Violations	Civil Monetary Penalty	EEs Employed in Violation
2	Janitorial Services	4	0	3
3	Janitorial Services	1	C	1

	M	N	0	Р
1	BW ATP	EE ATP	Findings Start Date	Findings End Date
2	134.7	3	30-MAY-11	29-MAY-13
3	526.5	1	09-DEC-19	05-JAN-20

	Q	R	S	Т
1	FLSA Violations	FLSA Repeat Violator	FLSA BW ATP	FLSA EEs ATP
2	4	N/A	134.7	3
3	1	N/A	526.5	1

	U	V	W	X
1	FLSA MW BW ATP	FLSA OT BW ATP	FLSA - 15 (a)(3) BW ATP	FLSA CMP Assessed
2	0	134.7	0	0
3	0	526.5	0	0

	Υ	Z	AA	AB
1	SCA Violations	SCA BW ATP	SCA EE ATP	MSPA Violations
2	0	0	0	0
3	0	0	0	0

	AC	AD	AE	AF
1	MSPA BW ATP	MSPA EE ATP	MSPA CMP Assessed	H1B Violations
2	0	0	0	0
3	0	0	0	0

	AG	AH	Al	AJ
1	H1B BW ATP	H1B EE ATP	H1B CMP Assessed	FMLA Violations
2	0	0	0	0
3	0	0	0	0

	AK	AL	AM	AN
1	FMLA BW ATP	FMLA EEs ATP	FMLA CMP Assessed	FLSA – CL Violations
2	0	0	0	0
3	0	0	0	0

	AO	AP	AQ	AR
1	FLSA – CL Minors	FLSA - CL CMP Assessed	DBRA Violations	DBRA BW ATP
2	0	0	0	0
3	0	0	0	0

	AS	AT	AU	AV
1	DBRA EE ATP	H2A Violations	H2A BW ATP	H2A EE ATP
2	0	0	0	0
3	0	0	0	0

	AW	AX	AY	AZ
1	H2A CMP Assessed	FLSA - SMW14 Violations	FLSA - SMW14 BW ATP	FLSA - SMW14 EEs ATP
2	0	0	0	0
3	0	0	0	0

	BA	BB	BC	BD
1	CWHSSA Violations	CWHSSA BW ATP	CWHSSA EE ATP	OSHA Violations
2	0	0	0	0
3	0	0	0	0

	BE	BF	BG	ВН
1	OSHA BW ATP	OSHA EEs ATP	OSHA CMP Assessed	EPPA Violations
2	0	0	0	0
3	0	0	0	0

	BI	BJ	BK	BL
1	EPPA BW ATP	EPPA EE ATP	EPPA CMP Assessed	H1A Violations
2	0	0	0	0
3	0	0	0	0

	BM	BN	ВО	BP
1	H1A BW ATP	H1A EE ATP	H1A CMP Assessed	CREW Violations
2	0	0	0	0
3	0	0	0	0

	BQ	BR	BS	ВТ
1	CREW BW ATP	CREW EE ATP	CREW CMP Assessed	CCPA Violations
2	0	0	0	0
3	0	0	0	0

	BU	BV	BW	BX
1	CCPA BW ATP	CCPA EE ATP	FLSA – SMWPW Violations	FLSA – SMWPW BW ATP
2	0	0	0	0
3	0	0	0	0

	BY	BZ	CA	СВ
1	FLSA – SMWPW EE ATP	FLSA - HMWKR Violations	FLSA - HMWKR BW ATP	FLSA - HMWKR EE ATP
2	0	0	0	0
3	0	0	0	0

	CC	CD	CE	CF
1	FLSA - HMWKR CMP Asse	CA Violations	CA BW ATP	CA EEs ATP
2	0	0	0	0
3	0	0	0	0

	CG	СН	CI	CJ
1	PCA Violations	PCA BW ATP	PCA EEs ATP	FLSA - SMWAP Violations
2	0	0	0	0
3	0	0	0	0

	CK	CL	СМ	CN
1	FLSA - SMWAP BW ATP	FLSA - SMWAP EE ATP	FLSA – SMWFT Violations	FLSA - SMWFT BW ATP
2	0	0	0	0
3	0	0	0	0

	CO	СР	CQ	CR
1	FLSA - SMWFT EE ATP	FLSA – SMWL Violations	FLSA - SMWL BW ATP	FLSA - SMWL EE ATP
2	0	0	0	0
3	0	0	0	0

	CS	СТ	CU	CV
1	FLSA - SMWMG Violations	FLSA - SMWMG BW ATP	FLSA - SMWMG EE ATP	FLSA - SMWSL Violations
2	0	0	0	0
3	0	0	0	0

	CW	CX	CY	CZ
1	FLSA - SMWSL BW ATP	FLSA - SMWSL EE ATP	EEV Violations	H2B Violations
2	0	0	0	0
3	0	0	0	0

	DA	DB	DC	DD
1	H2B BW ATP	H2B EE ATP	SRAW Violations	SRAW BW ATP
2	0	0	0	0
3	0	0	0	0

I		DE	
	1	SRAW EE ATP	
	2	(O
	3		0

EXHIBIT H

	A	В	С
1	Case ID	Trade Name	Legal Name
2	1965790	Packers Sanitation Services (PSSI)	Packers Sanitation Services, Inc., Ltd.
3	1965791	Packers Sanitation Services (PSSI)	PACKERS SANITATION SERVICES, INC., LTD.

	D	Е	F	G
1	Address	City	State	Zip Code
2	13500 I Court	Perry	IA	50220
3	2225 E. Commerce Drive	Mount Pleasant	IA	52641

	Н	I	J	K
1	NAICS	NAICS Description	Total Case Violations	Civil Monetary Penalty
2	56172	0 Janitorial Services	0	0
3	56172	0 Janitorial Services	0	0

	L	M	N	0
1	EEs Employed in Violation	BW ATP	EE ATP	Findings Start Date
2	0	0	0	09-MAY-20
3	0	0	0	09-MAY-20

	Р	Q	R	S
1	Findings End Date	FLSA Violations	FLSA Repeat Violator	FLSA BW ATP
2	08-MAY-22	0	N/A	0
3	08-MAY-22	0	N/A	0

	Т	U	V	W
1	FLSA EEs ATP	FLSA MW BW ATP	FLSA OT BW ATP	FLSA - 15 (a)(3) BW ATP
2	0	0	0	0
3	0	0	0	0

	X	Y	Z	AA
1	FLSA CMP Assessed	SCA Violations	SCA BW ATP	SCA EE ATP
2	0	0	0	0
3	0	0	0	0

	AB	AC	AD	AE
1	MSPA Violations	MSPA BW ATP	MSPA EE ATP	MSPA CMP Assessed
2	0	0	0	0
3	0	0	0	0

	AF	AG	АН	Al
1	H1B Violations	H1B BW ATP	H1B EE ATP	H1B CMP Assessed
2	0	0	0	0
3	0	0	0	0

	AJ	AK	AL	AM
1	FMLA Violations	FMLA BW ATP	FMLA EEs ATP	FMLA CMP Assessed
2	0	0	0	0
3	0	0	0	0

	AN	AO	AP	AQ
1	FLSA – CL Violations	FLSA – CL Minors	FLSA - CL CMP Assessed	DBRA Violations
2	(0	0	0
3	(0	0	0

	AR	AS	AT	AU
1	DBRA BW ATP	DBRA EE ATP	H2A Violations	H2A BW ATP
2	0	0	0	0
3	0	0	0	0

	AV	AW	AX	AY
1	H2A EE ATP	H2A CMP Assessed	FLSA - SMW14 Violations	FLSA - SMW14 BW ATP
2	0	0	0	0
3	0	0	0	0

	AZ	BA	BB	BC
	FLSA - SMW14 EEs ATP	CWHSSA Violations	CWHSSA BW ATP	CWHSSA EE ATP
2	0	0	0	0
	0	0	0	0

	BD	BE	BF	BG
1	OSHA Violations	OSHA BW ATP	OSHA EEs ATP	OSHA CMP Assessed
2	0	0	0	0
3	0	0	0	0

	ВН	BI	BJ	BK
1	EPPA Violations	EPPA BW ATP	EPPA EE ATP	EPPA CMP Assessed
2	0	0	0	0
3	0	0	0	0

	BL	ВМ	BN	ВО
1	H1A Violations	H1A BW ATP	H1A EE ATP	H1A CMP Assessed
2	0	0	0	0
3	0	0	0	0

	BP	BQ	BR	BS
1	CREW Violations	CREW BW ATP	CREW EE ATP	CREW CMP Assessed
2	C	0	0	0
3	C	0	0	0

	ВТ	BU	BV	BW
1	CCPA Violations	CCPA BW ATP	CCPA EE ATP	FLSA – SMWPW Violations
2	0	0	0	0
3	0	0	0	0

	BX	BY	BZ	CA
	FLSA – SMWPW BW ATP	FLSA – SMWPW EE ATP	FLSA - HMWKR Violations	FLSA - HMWKR BW ATP
2	2 0	0	0	0
	0	0	0	0

	СВ	CC	CD	CE
1	FLSA - HMWKR EE ATP	FLSA - HMWKR CMP Asse	CA Violations	CA BW ATP
2	0	0	0	0
3	0	0	0	0

	CF	CG	СН	Cl
1	CA EEs ATP	PCA Violations	PCA BW ATP	PCA EEs ATP
2	0	0	0	0
3	0	0	0	0

	CJ	CK	CL	CM
1	FLSA - SMWAP Violations	FLSA - SMWAP BW ATP	FLSA - SMWAP EE ATP	FLSA – SMWFT Violations
2	0	0	0	0
3	0	0	0	0

	CN	CO	СР	CQ
1	FLSA - SMWFT BW ATP	FLSA - SMWFT EE ATP	FLSA – SMWL Violations	FLSA - SMWL BW ATP
2	0	0	0	0
3	0	0	0	0

	CR	CS	СТ	CU
	FLSA - SMWL EE ATP	FLSA - SMWMG Violations	FLSA - SMWMG BW ATP	FLSA - SMWMG EE ATP
	0	0	0	0
[]	0	0	0	0

	CV	CW	CX	CY
1	FLSA - SMWSL Violations	FLSA - SMWSL BW ATP	FLSA - SMWSL EE ATP	EEV Violations
2	0	0	0	0
3	0	0	0	0

	CZ	DA	DB	DC
1	H2B Violations	H2B BW ATP	H2B EE ATP	SRAW Violations
2	0	0	0	0
3	0	0	0	0

	DD	DE
1	SRAW BW ATP	SRAW EE ATP
2	0	0
3	0	0

EXHIBIT I

	А	В	С
1	Case ID	Trade Name	Legal Name
2	1706411	Packers Sanitation Services, Inc	Packers Sanitation Services, Inc

	D	E	F
1	Address	City	State
2	6515 91st Ave	Tolleson	AZ

	G	Н	I
1	Zip Code	NAICS	NAICS Description
2	85353	325612	Polish and Other Sanitation Good

	J	K	L
1	Total Case Violations	Civil Monetary Penalty	EEs Employed in Violation
2	0	0	0

	M	N	0
1	BW ATP	EE ATP	Findings Start Date
2	0	0	01-JAN-12

	Р	Q	R
1	Findings End Date	FLSA Violations	FLSA Repeat Violator
2	01-JAN-14	0 N/A	

	S	Т	U
1	FLSA BW ATP	FLSA EEs ATP	FLSA MW BW ATP
2	0	0	0

	V	W	X
1	FLSA OT BW ATP	FLSA - 15 (a)(3) BW ATP	FLSA CMP Assessed
2	0	0	0

	Y	Z	AA
1	SCA Violations	SCA BW ATP	SCA EE ATP
2	0	0	0

	AB	AC	AD
1	MSPA Violations	MSPA BW ATP	MSPA EE ATP
2	0	0	0

	AE	AF	AG
1	MSPA CMP Assessed	H1B Violations	H1B BW ATP
2	0	0	0

	AH	Al	AJ
1	H1B EE ATP	H1B CMP Assessed	FMLA Violations
2	0	0	0

	AK	AL	AM
1	FMLA BW ATP	FMLA EEs ATP	FMLA CMP Assessed
2	0	0	0

	AN	AO	AP
1	FLSA – CL Violations	FLSA – CL Minors	FLSA - CL CMP Assessed
2	0	0	0

	AQ	AR	AS
1	DBRA Violations	DBRA BW ATP	DBRA EE ATP
2	0	0	0

	AT	AU	AV
1	H2A Violations	H2A BW ATP	H2A EE ATP
2	0	0	0

	AW	AX	AY
1	H2A CMP Assessed	FLSA - SMW14 Violations	FLSA - SMW14 BW ATP
2	(0	0

	AZ	BA	BB
1	FLSA - SMW14 EEs ATP	CWHSSA Violations	CWHSSA BW ATP
2	0	0	0)

	BC	BD	BE
1	CWHSSA EE ATP	OSHA Violations	OSHA BW ATP
2	0	0	0)

	BF	BG	ВН
1	OSHA EEs ATP	OSHA CMP Assessed	EPPA Violations
2	0	0	0

	BI	BJ	BK
1	EPPA BW ATP	EPPA EE ATP	EPPA CMP Assessed
2	0	0	0

	BL	ВМ	BN
1	H1A Violations	H1A BW ATP	H1A EE ATP
2	0	0	0

	ВО	BP	BQ
1	H1A CMP Assessed	CREW Violations	CREW BW ATP
2	0	0	0

	BR	BS	BT
1	CREW EE ATP	CREW CMP Assessed	CCPA Violations
2	0	0	0

	BU	BV	BW
1	CCPA BW ATP	CCPA EE ATP	FLSA – SMWPW Violations
2	0	0	0

	BX	BY	BZ
1	FLSA – SMWPW BW ATP	FLSA – SMWPW EE ATP	FLSA - HMWKR Violations
2	0	0	0

	CA	СВ	CC
1	FLSA - HMWKR BW ATP	FLSA - HMWKR EE ATP	FLSA - HMWKR CMP Asse
2	0	0	0

	CD	CE	CF
1	CA Violations	CA BW ATP	CA EEs ATP
2	0	0	0

	CG	СН	Cl
1	PCA Violations	PCA BW ATP	PCA EEs ATP
2	0	0	0

	CJ	CK	CL
1	FLSA - SMWAP Violations	FLSA - SMWAP BW ATP	FLSA - SMWAP EE ATP
2	0	0	0

	CM	CN	CO
1	FLSA – SMWFT Violations	FLSA - SMWFT BW ATP	FLSA - SMWFT EE ATP
2	0	0	0

	СР	CQ	CR
1	FLSA – SMWL Violations	FLSA - SMWL BW ATP	FLSA - SMWL EE ATP
2	0	0	0

	CS	СТ	CU
1	FLSA - SMWMG Violations	FLSA - SMWMG BW ATP	FLSA - SMWMG EE ATP
2	0	0	0

	CV	CW	CX
1	FLSA - SMWSL Violations	FLSA - SMWSL BW ATP	FLSA - SMWSL EE ATP
2	0	0	0

	CY	CZ	DA
1	EEV Violations	H2B Violations	H2B BW ATP
2	0	0	0

	DB	DC	DD
1	H2B EE ATP	SRAW Violations	SRAW BW ATP
2	0	0	0

	DE
1	SRAW EE ATP
2	0

EXHIBIT J

	А	В	С	D
1	Case ID	Trade Name	Legal Name	Address
2	1870620	Packers Sanitation Services, Inc., Ltd.	Packers Sanitation Services, Inc.,	4135 Birney Ave

	E	F	G	Н
1	City	State	Zip Code	NAICS
2	Moosic	PA	18507	561720

	I	J	K	L
1	NAICS Description	Total Case Violations	Civil Monetary Penalty	EEs Employed in Violation
2	Janitorial Services	1	C	1

	M	N	0	Р
1	BW ATP	EE ATP	Findings Start Date	Findings End Date
2	663	1	12-OCT-18	17-JAN-19

	Q	R	S	Т
1	FLSA Violations	FLSA Repeat Violator	FLSA BW ATP	FLSA EEs ATP
2	1	R	663	1

	U	V	W	X
1	FLSA MW BW ATP	FLSA OT BW ATP	FLSA - 15 (a)(3) BW ATP	FLSA CMP Assessed
2	0	663	0	0

	Y	Z	AA	AB
1	SCA Violations	SCA BW ATP	SCA EE ATP	MSPA Violations
2	0	0	0	0

	AC	AD	AE	AF
1	MSPA BW ATP	MSPA EE ATP	MSPA CMP Assessed	H1B Violations
2	0	0	0	0

	AG	АН	Al	AJ
1	H1B BW ATP	H1B EE ATP	H1B CMP Assessed	FMLA Violations
2	0	0	0	0

	AK	AL	AM	AN
1	FMLA BW ATP	FMLA EEs ATP	FMLA CMP Assessed	FLSA – CL Violations
2	0	0	0	0

	AO	AP	AQ	AR
1	FLSA – CL Minors	FLSA - CL CMP Assessed	DBRA Violations	DBRA BW ATP
2	0	0	0	0

	AS	AT	AU	AV
1	DBRA EE ATP	H2A Violations	H2A BW ATP	H2A EE ATP
2	0	0	0	0

	AW	AX	AY	AZ
1	H2A CMP Assessed	FLSA - SMW14 Violations	FLSA - SMW14 BW ATP	FLSA - SMW14 EEs ATP
2	0	0	0	0

	BA	BB	BC	BD
1	CWHSSA Violations	CWHSSA BW ATP	CWHSSA EE ATP	OSHA Violations
2	0	0	0	0

	BE	BF	BG	ВН
1	OSHA BW ATP	OSHA EEs ATP	OSHA CMP Assessed	EPPA Violations
2	0	0	0	0

	BI	BJ	BK	BL
1	EPPA BW ATP	EPPA EE ATP	EPPA CMP Assessed	H1A Violations
2	0	0	0	0

	BM	BN	ВО	BP
1	H1A BW ATP	H1A EE ATP	H1A CMP Assessed	CREW Violations
2	0	0	0	0

	BQ	BR	BS	BT
1	CREW BW ATP	CREW EE ATP	CREW CMP Assessed	CCPA Violations
2	0	0	0	0

	BU	BV	BW	BX
1	CCPA BW ATP	CCPA EE ATP	FLSA - SMWPW Violations	FLSA – SMWPW BW ATP
2	0	0	0	0

	BY	BZ	CA	СВ
1	FLSA – SMWPW EE ATP	FLSA - HMWKR Violations	FLSA - HMWKR BW ATP	FLSA - HMWKR EE ATP
2	0	0	0	0

	CC	CD	CE	CF
1	FLSA - HMWKR CMP Asse	CA Violations	CA BW ATP	CA EEs ATP
2	0	0	0	0

	CG	СН	CI	CJ
1	PCA Violations	PCA BW ATP	PCA EEs ATP	FLSA - SMWAP Violations
2	0	0	0	0

	CK	CL	CM	CN
1	FLSA - SMWAP BW ATP	FLSA - SMWAP EE ATP	FLSA – SMWFT Violations	FLSA - SMWFT BW ATP
2	0	0	0	0

	CO	СР	CQ	CR
1	FLSA - SMWFT EE ATP	FLSA – SMWL Violations	FLSA - SMWL BW ATP	FLSA - SMWL EE ATP
2	0	0	0	0

	CS	СТ	CU	CV
1	FLSA - SMWMG Violations	FLSA - SMWMG BW ATP	FLSA - SMWMG EE ATP	FLSA - SMWSL Violations
2	0	0	0	0

	CW	CX	CY	CZ
1	FLSA - SMWSL BW ATP	FLSA - SMWSL EE ATP	EEV Violations	H2B Violations
2	0	0	0	0

	DA	DB	DC	DD
1	H2B BW ATP	H2B EE ATP	SRAW Violations	SRAW BW ATP
2	0	0	0	0

	DE
1	SRAW EE ATP
2	0

EXHIBIT K

	A	В	С
1	Case ID	Trade Name	Legal Name
2	1587103	PSSI (Packers Sanitation Services, Inc.)	Packers Sanitation Services Inc., LLC

	D	E	F	G
1	Address	City	State	Zip Code
2	13264 Mountain Road	Glen Allen	VA	23059

	Н		J	K
1	NAICS	NAICS Description	Total Case Violations	Civil Monetary Penalty
2	56221	Waste Treatment and Disposal	55	0

	L	M	N	0
1	EEs Employed in Violation BW ATP		EE ATP	Findings Start Date
2	48	5249.19	48 30-APR-10	

	Р	Q	R	S
1	Findings End Date	FLSA Violations	FLSA Repeat Violator	FLSA BW ATP
2	08-OCT-10	55 N/A		5249.19

	Т	U	V	W
1	FLSA EEs ATP	FLSA MW BW ATP	FLSA OT BW ATP	FLSA - 15 (a)(3) BW ATP
2	48	777.05	4472.14	0

	X	Υ	Z	AA
1	FLSA CMP Assessed	SCA Violations	SCA BW ATP	SCA EE ATP
2	C)	0	0

	AB	AC	AD	AE
1	MSPA Violations	MSPA BW ATP	MSPA EE ATP	MSPA CMP Assessed
2	0	C	0	0

	AF	AG	AH	Al
1	H1B Violations	H1B BW ATP	H1B EE ATP	H1B CMP Assessed
2	0	0	0	0

	AJ	AK	AL	AM
1	FMLA Violations	FMLA BW ATP	FMLA EEs ATP	FMLA CMP Assessed
2	0	0	0	0

	AN	AO	AP	AQ
1	FLSA – CL Violations	FLSA – CL Minors	FLSA - CL CMP Assessed	DBRA Violations
2	0	0	0	0

	AR	AS	AT	AU
1	DBRA BW ATP	DBRA EE ATP	H2A Violations	H2A BW ATP
2	0	C	0	0

	AV	AW	AX	AY
1	H2A EE ATP	H2A CMP Assessed	FLSA - SMW14 Violations	FLSA - SMW14 BW ATP
2	0	0	0	0

	AZ	BA	BB	BC
1	FLSA - SMW14 EEs ATP	CWHSSA Violations	CWHSSA BW ATP	CWHSSA EE ATP
2	0	0	0	0

	BD	BE	BF	BG
1	OSHA Violations	OSHA BW ATP	OSHA EEs ATP	OSHA CMP Assessed
2	0	0	0	0

	ВН	BI	BJ	BK
1	EPPA Violations	EPPA BW ATP	EPPA EE ATP	EPPA CMP Assessed
2	0	0	0	0

	BL	BM	BN	ВО
1	H1A Violations	H1A BW ATP	H1A EE ATP	H1A CMP Assessed
2	0	0	0	0

	BP	BQ	BR	BS
1	CREW Violations	CREW BW ATP	CREW EE ATP	CREW CMP Assessed
2	0	0	0	0

	ВТ	BU	BV	BW
1	CCPA Violations	CCPA BW ATP	CCPA EE ATP	FLSA – SMWPW Violations
2	0	C	0	0

	BX	BY	BZ	CA
1	FLSA – SMWPW BW ATP	FLSA – SMWPW EE ATP	FLSA - HMWKR Violations	FLSA - HMWKR BW ATP
2	0	0	0	0

	СВ	CC	CD	CE
1	FLSA - HMWKR EE ATP	FLSA - HMWKR CMP Asse	CA Violations	CA BW ATP
2	0	0	0	0

	CF	CG	СН	CI
1	CA EEs ATP	PCA Violations	PCA BW ATP	PCA EEs ATP
2	0	0	0	0

	CJ	CK	CL	CM
1	FLSA - SMWAP Violations	FLSA - SMWAP BW ATP	FLSA - SMWAP EE ATP	FLSA – SMWFT Violations
2	0	0	0	0

	CN	CO	СР	CQ
1	FLSA - SMWFT BW ATP	FLSA - SMWFT EE ATP	FLSA – SMWL Violations	FLSA - SMWL BW ATP
2	0	(0	0

	CR	CS	СТ	CU
1	FLSA - SMWL EE ATP	FLSA - SMWMG Violations	FLSA - SMWMG BW ATP	FLSA - SMWMG EE ATP
2	0	0	0	0

	CV	CW	CX	CY
1	FLSA - SMWSL Violations	FLSA - SMWSL BW ATP	FLSA - SMWSL EE ATP	EEV Violations
2	0	0	0	0

	CZ	DA	DB	DC
1	H2B Violations	H2B BW ATP	H2B EE ATP	SRAW Violations
2	0	0	0	0

	DD	DE
1	SRAW BW ATP	SRAW EE ATP
2	0	0

EXHIBIT L

	А	В	С	D
1	August 19, 2013 throgh	Trade Name	Legal Name	Address
2	1616048	PSSI	Packer Sanitation Services, Inc.	624 E. 7th, Suite H
3	1767825	PSSI	Packers Sanitation Services Inc. Ltd.	510 N. Kansas
4	1801867	PSSI	Packers Sanitation Services, Inc.	3681 Prism Lane
5	1845133	PSSI	Packers Sanitation Services, Inc., Ltd.	10150 FM 14
6	1967970	PSSI	Packers Sanitation Services Inc, Ltd.	750 S. Schmidt Rd.

	E	F	G	Н
1	City	State	Zip Code	NAICS
2	Dumas	TX	79029	561720
3	Liberal	KS	67901	561720
4	Kieler	WI	53812	561720
5	Tyler	TX	75706	311615
6	Bolingbrook	IL	60440	561720

	I	J	K	L
1	NAICS Description	Total Case Violations	Civil Monetary Penalty	EEs Employed in Violation
2	Janitorial Services	2	0	1
3	Janitorial Services	1	0	1
4	Janitorial Services	6	0	1
5	Poultry Processing	1	0	1
6	Janitorial Services	0	0	0

	M	N	0	Р
1	BW ATP	EE ATP	Findings Start Date	Findings End Date
2	587.25	1	03-APR-11	17-APR-11
3	0	0	19-AUG-13	16-AUG-15
4	6272.97	1	09-SEP-16	09-DEC-16
5	3500	1	29-JUL-17	09-FEB-18
6	0	0	17-JUN-20	16-Jun-22

	Q	R	S	Т
1	FLSA Violations	FLSA Repeat Violator	FLSA BW ATP	FLSA EEs ATP
2	2	N/A	587.25	1
3	1	N/A	0	0
4	0	N/A	0	0
5	0	N/A	0	0
6	0	N/A	0	0

	U	V	W	X
1	FLSA MW BW ATP	FLSA OT BW ATP	FLSA - 15 (a)(3) BW ATP	FLSA CMP Assessed
2	587.25	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	Y	Z	AA	AB
1	SCA Violations	SCA BW ATP	SCA EE ATP	MSPA Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	AC	AD	AE	AF
1	MSPA BW ATP	MSPA EE ATP	MSPA CMP Assessed	H1B Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	AG	AH	Al	AJ
1	H1B BW ATP	H1B EE ATP	H1B CMP Assessed	FMLA Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	6
5	0	0	0	1
6	0	0	0	0

	AK	AL	AM	AN
1	FMLA BW ATP	FMLA EEs ATP	FMLA CMP Assessed	FLSA – CL Violations
2	0	0	0	0
3	0	0	0	0
4	6272.97	1	0	0
5	3500	1	0	0
6	0	0	0	0

	AO	AP	AQ	AR
1	FLSA – CL Minors	FLSA - CL CMP Assessed	DBRA Violations	DBRA BW ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	AS	AT	AU	AV
1	DBRA EE ATP	H2A Violations	H2A BW ATP	H2A EE ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	AW	AX	AY	AZ
1	H2A CMP Assessed	FLSA - SMW14 Violations	FLSA - SMW14 BW ATP	FLSA - SMW14 EEs ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	BA	BB	BC	BD
1	CWHSSA Violations	CWHSSA BW ATP	CWHSSA EE ATP	OSHA Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	BE	BF	BG	ВН
1	OSHA BW ATP	OSHA EEs ATP	OSHA CMP Assessed	EPPA Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	BI	BJ	BK	BL
1	EPPA BW ATP	EPPA EE ATP	EPPA CMP Assessed	H1A Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	ВМ	BN	ВО	BP
1	H1A BW ATP	H1A EE ATP	H1A CMP Assessed	CREW Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	BQ	BR	BS	BT
1	CREW BW ATP	CREW EE ATP	CREW CMP Assessed	CCPA Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	BU	BV	BW	BX
1	CCPA BW ATP	CCPA EE ATP	FLSA - SMWPW Violations	FLSA – SMWPW BW ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	BY	BZ	CA	СВ
1	FLSA – SMWPW EE ATP	FLSA - HMWKR Violations	FLSA - HMWKR BW ATP	FLSA - HMWKR EE ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	CC	CD	CE	CF
1	FLSA - HMWKR CMP Asse	CA Violations	CA BW ATP	CA EEs ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	CG	СН	CI	CJ
1	PCA Violations	PCA BW ATP	PCA EEs ATP	FLSA - SMWAP Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	CK	CL	СМ	CN
1	FLSA - SMWAP BW ATP	FLSA - SMWAP EE ATP	FLSA – SMWFT Violations	FLSA - SMWFT BW ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	CO	СР	CQ	CR
1	FLSA - SMWFT EE ATP	FLSA – SMWL Violations	FLSA - SMWL BW ATP	FLSA - SMWL EE ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	CS	СТ	CU	CV
1	FLSA - SMWMG Violations	FLSA - SMWMG BW ATP	FLSA - SMWMG EE ATP	FLSA - SMWSL Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	CW	CX	CY	CZ
1	FLSA - SMWSL BW ATP	FLSA - SMWSL EE ATP	EEV Violations	H2B Violations
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	DA	DB	DC	DD
1	H2B BW ATP	H2B EE ATP	SRAW Violations	SRAW BW ATP
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0

	DE
1	SRAW EE ATP
2	0
3	0
4	0
5	0
6	0